

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

February 10, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUnited States of America
v.Jakeline Silva-Padilla
XXX XXX 939BY: CM
DEPUTYCase No. **SA:25-MJ-189**Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 7, 2025 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1326(a)

Illegal Reentry

Penalties: Maximum Penalties: 2 years confinement, \$250,000 Fine or
Both; 1 year supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

MICHAEL N DRYJA

Digitally signed by MICHAEL N
DRYJA
Date: 2025.02.07 12:10:14 -06'00'*Complainant's signature*

Michael Dryja, Deportation Officer

Printed name and title

- ☐
- Sworn to before me and signed in my presence.
-
- ☒
- Sworn to telephonically and signed electronically.

Date: February 10, 2025*Judge's signature*City and state: San Antonio, Texas

Honorable Richard B. Farrer, U.S. Magistrate Judge

Printed name and title

Being duly sworn, I declare that the following is true and correct to the best of my knowledge:

My name is Michael Dryja and I am a Deportation Officer with Immigration and Customs Enforcement (ICE) and with whom I have been employed since January 3, 1999. I am authorized by the United States Department of Homeland Security to enforce the Immigration Laws and Regulations of the United States or any other Laws or Regulations designated by the Attorney General or his successor, the Secretary of the Department of Homeland Security.

On or about October 31, 2024, ICE received information Jakeline Silva-Padilla (hereafter SILVA), a native and citizen of Mexico who was previously removed from the United States to Mexico, was unlawfully present in the United States. ICE officers initiated an investigation.

On February 7, 2025, ICE officers conducted surveillance of Silva's suspected address (hereafter "target address") in San Antonio, Texas, which is located within the Western District of Texas. ICE Officers observed an adult female matching the photograph and physical description of SILVA enter a vehicle and depart the residence. ICE officers followed the vehicle to 2502 Blanco Road in San Antonio, Texas, within the Western District of Texas. SILVA was identified, arrested and transported to the ICE Resident office in San Antonio for processing.

At the ICE ERO Resident Office, SILVA's fingerprints were submitted through Immigration and FBI databases which revealed that SILVA is a citizen and national of Mexico with assigned Alien Registration Number A-XXX-XXX-939. A review of A-XXX-XXX-939 in the Enforce Alien Removal Module ("EARM"), a Department of Homeland Security database, revealed that SILVA is an alien who was previously removed from the United States to Mexico on or about August 14, 2024. Immigration databases revealed that SILVA has not been granted permission to reapply for admission from the Attorney General of the United States, or his successor, after his removal.

On February 7, 2025, SILVA was advised about her right to consular notification and the Consulate of Mexico was notified about SILVA arrest.

On February 7, 2025, an Immigration detainer will be sent to the United States Marshal Service.

Based on the foregoing facts, there is probable cause to believe that SILVA has illegally re-entered the United States in violation of Title 8 United States Code, Section 1326(a).

MICHAEL
N DRYJA

Digitally signed by
MICHAEL N DRYJA
Date: 2025.02.07
12:50:53 -06'00'

Michael Dryja
Deportation Officer
Immigration and Customs
Enforcement

Subscribed and sworn before me the 10th day of
February 2025.

A handwritten signature in blue ink, appearing to read "RBF", is written over a horizontal line.

Richard B. Farrer
UNITED STATES MAGISTRATE JUDGE